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April 13, 2020

Via E-Mail Only

Chairwoman Marcie Edwards
Wildfire Safety Advisory Board
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Email: WildfireSafetyAdvisoryBoard@cpuc.ca.gov

Re: **Comments of the Coalition of California Utility Employees on the Wildfire Safety Advisory Board's Draft Recommendations on the 2020 Utility Wildfire Mitigation Plans**

Dear Chairwoman Edwards and Board Members:

We are writing on behalf of the Coalition of California Utility Employees ("CUE") to provide comments on the Wildfire Safety Advisory Board's ("Board") Recommendations on the 2020 Utility Wildfire Mitigation Plans.¹

I. Introduction

CUE is a coalition of labor unions whose approximately 43,000 members work at nearly all the California utilities, both publicly and privately owned. CUE's coalition union members make up the on-the-ground workforce of the three large investor owned utilities ("IOUs") that implements electric operations and maintenance policies and practices, including, for example, service restoration

¹ Wildfire Safety Advisory Board, Draft Recommendations on the 2020 Utility Wildfire Mitigation Plans (Apr. 3, 2020), *available at* https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About_Us/Organization/Divisions/WSAB/WSAB%20Recs%20on%202020%20Utility%20WMPs%20-%20April%2015%20Meeting%20Draft%20-%2004.03.2020.pdf.

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following a power safety power shutoff (“PSPS”) event. CUE’s coalition union members are directly impacted by implementation of the IOUs’ wildfire mitigation plans (“WMPs”). CUE has participated in proceedings before the California Public Utilities Commission (“Commission”) for 25 years, including as a party to the Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 (2018), R. 18-10-007.

Climate change will cause increasingly severe and more frequent wildfires. Five of the most destructive wildfires in California history occurred in 2017. The deadliest and most destructive wildfire in California’s history burned in 2018. These wildfires caused loss of life, property damage, public health impacts, environmental degradation, damage to local economies and adverse impacts to electric distribution systems. It is critically important that the IOUs continue to improve their WMPs to achieve the highest levels of safety, reliability, and resiliency.

CUE’s comments focus on the Board’s recommendations to expand training programs, hire qualified electrical workers, and improve re-energization after PSPS events.

II. CUE Supports the Board’s Recommendations to Improve IOU Training Programs and Hire Qualified Electrical Workers

The Board has two recommendations for improving inspections of potential wildfire hazards. First, the Board recommends that the Division consider whether the utilities are hiring electrical asset inspectors with qualifications that go beyond a basic knowledge of General Order 95 requirements.² Second, the Board recommends that the Division consider whether the utilities are developing robust training programs that (A) train workers to identify hazards that could ignite wildfires, and (B) increase the pool of qualified electrical workers.³

The Board correctly observes that the level of expertise currently relied upon by IOUs to perform electrical inspections varies across the utilities.⁴ For example, PG&E deploys journeyman linemen to complete the necessary asset inspections within High Fire Threat Districts (“HFTD”), but SCE and SDG&E have utilized a

² *Id.* at 21.

³ *Id.*

⁴ *Id.* at 22.

mix of linemen and overhead inspectors to complete similar tasks. While overhead inspectors have basic knowledge of General Order 95, these workers do not have the expertise or experience required, such as identifying what infrastructure may need to be replaced, re-engineered, or sectionalized. The IOUs must train and retain enough qualified electrical workers to complete the necessary wildfire mitigation inspections to make the electrical systems more resilient and resistant to wildfire.

CUE agrees with the Board that the IOUs should train additional workers to inspect electrical assets within each wildfire mitigation area. A dedicated workforce of qualified inspectors will provide a level of skill and experience that the Commission, the Division, and the public can rely on for accurate and informative mapping of IOU assets, as well as ensure that the assets are being managed safely and properly. Investing in training programs and developing the workforce now will produce substantial long-term benefits.

III. CUE Supports the Board's Recommendations to Improve Re-Energization After PSPS Events

The Board recommends that the Division consider directing the IOUs to develop informal and specific re-energization timeframe goals for the 2020 WMPs as well as including those goals in the 2021 WMPs.⁵ In addition, the Board recommends that the utilities' wildfire mitigation measures be designed to prioritize quick re-energization of lines once it is safe to end a PSPS event.⁶

CUE agrees with the Board's recommendation that the IOUs should develop informal and specific re-energization time frame goals. However, CUE does not support any requirement that the IOUs re-energize lines following a PSPS event within a specific time period.

First and foremost, public and worker safety must be paramount. To safely restore power after PSPS events, IOUs must inspect all impacted power lines and equipment for damage or other conditions that may be a public safety hazard. IOUs can restore power only after any hazards are removed and damage is repaired. The circumstances of an event may make it impossible to inspect all affected power lines with a short period of time. IOUs should not be forced to choose between violating a

⁵ *Id.* at 30.

⁶ *Ibid.*

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requirement and risking public or worker safety. Safety must always be prioritized over quick restoration.

Second, setting a hard deadline fails to account for the varying circumstances for each event. The speed with which the safety assessments can be completed is dictated by several complex factors, including the scale of the PSPS event, the availability of resources (i.e., qualified personnel, equipment, etc.), and suitable weather conditions. A high wind event followed immediately by a rainstorm or snowstorm is different than one that is followed by clear, dry, and calm conditions.

Finally, if a re-energization deadline is recommended in the future, it should be flexible enough to accommodate unique circumstances that may arise following a PSPS event. Weather conditions causing a PSPS event may cause significant damage to the grid, requiring significant repairs. For example, in addition to depositing branches in wires, a high wind event could knock down poles and wires, and damage transformers and switches. These could be in remote or hard to access locations. As a result, it may be impossible to repair damage that occurs and re-energize the lines within a specified time period.

CUE agrees that the IOUs should track the amount of time it takes to re-energize for each circuit after determining that adverse weather conditions have ended. For any circuits where restoration is delayed, the IOUs should determine the cause(s) of the delay, including whether it was related to limited staff, equipment, access, or other issues. This data will inform future re-energization efforts as the IOUs reduce the scope of de-energization events and refine their re-energization processes.

Re-energization is complex. While IOUs may be able to restore power to most lines within a short time period, there will certainly be circumstances when it will take longer. The Board's recommendation that the IOUs should develop informal re-energization goals is appropriate; the IOUs' hands should not be tied with a hard and fast re-energization deadline. Safe restoration should always be prioritized over speed.

IV. Conclusion

CUE wholly supports the Board's recommendations to improve IOU training programs, hire qualified electrical workers, and improve re-energization efforts following PSPS events. CUE looks forward to working with the Board to assist the

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IOUs' efforts to reduce the wildfire threat in California and ensure that the grid is maintained in a safe and reliable manner.

Thank you for your consideration of these comments.

Sincerely,



Andrew J. Graf

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